

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOSAIC SUSTAINABLE FINANCE
CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 25-90156 (CML)
)

)
) (Joint Administration Requested)
) (Emergency Hearing Requested)

**NOTICE OF DESIGNATION OF COMPLEX
CHAPTER 11 BANKRUPTCY CASE**

On June 6, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”). The undersigned proposed counsel believes that these chapter 11 cases qualify as complex chapter 11 case because:

- X The Debtor has total debt of more than \$10 million;
- X There are more than 50 parties in interest in this chapter 11 case;
- Claims against or interests in the Debtor are publicly traded;
- Other (Substantial explanation is required).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Mosaic Sustainable Finance Corporation (6802); Solar Mosaic LLC (3655); Modern Home LLC (4998); Mosaic Funding Holdings LLC (0866); and SMCTX LLC (6303). The service address for each of the above Debtors is 601 12th Street, Suite 325, Oakland, California 94607.

WHEREFORE, the Debtors requests entry of an order substantially in the form attached hereto as **Exhibit A** granting the relief requested herein and such other and further relief as the Court may deem just and proper.

Dated: June 6, 2025

Houston, Texas

/s/ Charles Persons

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Proposed Counsel to the Debtors and Debtors in Possession

Certificate of Accuracy

I certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Charles Persons
Charles Persons

Certificate of Service

I certify that on June 6, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles Persons
Charles Persons

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
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) (Emergency Hearing Requested)

**ORDER GRANTING COMPLEX
CHAPTER 11 BANKRUPTCY CASE**

On June 6, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed these chapter 11 cases (the “Chapter 11 Cases”) and the *Notice of Designation of Complex Chapter 11 Cases* (the “Notice”).² Based on its review of the initial pleadings, the Court concludes that the complex chapter 11 case designation is appropriate. Accordingly, the Court hereby orders:

1. The Procedures for Complex Chapter 11 Cases in the Southern District of Texas apply to these Chapter 11 Cases. The procedures are posted on the Court’s website. Compliance with the procedures is required.

2. The Debtors must give notice of this Order to all parties in interest within seven (7) days. If a party in interest objects to the provisions of this Order, that party may file an appropriate motion within fourteen (14) days after service of the Order.

3. The Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”) apply to this Chapter 11 Case, subject to the following modifications:

- a) Bankruptcy Local Rule 1001-1(b) does not apply.
- b) Rule 83.1 of the Local Rules of the U.S. District Court of the Southern District of Texas (the “Local Rules of the District Court”) applies.
- c) Appendix A to the Local Rules of the District Court applies.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Mosaic Sustainable Finance Corporation (6802); Solar Mosaic LLC (3655); Modern Home LLC (4998); Mosaic Funding Holdings LLC (0866); and SMCTX LLC (6303). The service address for each of the above Debtors is 601 12th Street, Suite 325, Oakland, California 94607.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Notice.

- d) If a conflict exists between the Bankruptcy Local Rules and the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* govern.

Dated: _____, 2025
Houston, Texas

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE